

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA  
LAFAYETTE DIVISION**

<b>JAMILA MITCHELL,</b>	*	<b>CIVIL ACTION NO. 6:12-cv-02151-RTH-CMH</b>
	*	
<b>Plaintiff,</b>	*	<b>JUDGE: RICHARD T. HAIK</b>
	*	
<b>VERSUS</b>	*	<b>MAGISTRATE: C. MICHAEL HILL</b>
	*	
<b>DAVID M. VIETH, D.D.S. (indi-</b>	*	
<b>vidually and officially); DAVID</b>	*	
<b>VEITH, D.D.S., a Professional</b>	*	
<b>corporation doing business as</b>	*	
<b>KOOL SMILES (trade mark), et</b>	*	
<b>al</b>	*	
<b>Defendants.</b>	*	
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**MOTION TO EXTEND DEADLINES**

**NOW INTO COURT**, through undersigned counsel, comes Plaintiff, JAMILA MITCHELL, who with respect represents:

1.

Due to computer crash and change in internet service provider, Plaintiff received service of Motions for Summary Judgment on or about October 22, 2013, though the service date on the order is October 17, 2013.

2.

Defense counsel waited until October 18, 2013, but plaintiff did not receive those documents until October 22, 2013, to respond to plaintiff's discovery and in total served, in response to request for production of documents, over 6000 documents to the plaintiff.

3.

Due to the number of documents to be reviewed by plaintiff, plaintiff needs additional time in which to respond to the motions for summary judgments.

4.

As such, Claimant requests this court to issue an order to extend deadlines to respond to the summary judgments filed by the defendants.

5.

Wherefore Petitioner prays that this court issues and Order to Extend deadlines of the response to the summary judgments.

s/Gloria A. Angus

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COUNSEL FOR THE PLAINTIFF,  
JAMILA MITCHELL

**CERTIFICATE OF SERVICE**

I hereby certify that on November 12, 2013, I electronically filed a copy of the foregoing Motion for Extension of all deadlines with the Clerk of Court using the CM/ECF system, which will provide notice to:  
KEITH M. PYBURN  
MICHELLE ANDERSON  
201 ST. CHARLES AVENUE, SUITE 3710  
NEW ORLEANS, LOUISIANA 70170

s/Gloria A. Angus  
GLORIA A. ANGUS